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SAFMC COMPREHENSIVE ECOSYSTEM-BASED AMENDMENT 2

Angler Conservation Education, Inc. (ACE) submits the following recommendation about the SAFMC Comprehensive Ecosystem-Based Amendment 2 (CE-BA 2).

ACTION 5: MODIFY SEA TURTLE RELEASE GEAR REQUIREMENTS FOR THE SNAPPER GROUPER FISHERY

ACE supports Alternative 5 modifying the design specifications of the current Sea Turtle release and Smalltooth Sawfish gear equipment for all federally permitted non-longline Snapper Grouper vessels with hook and line gear on board to match the specifications as described in the NOAA Technical Memorandum (TM-580) NMFS-SEFSC-580 "Careful Release Protocols for Sea Turtle Release with Minimal Injury." These new design criteria allow for less "heavy-duty" gears more appropriate for lighter tackle used by Snapper Grouper fishermen.

An important quote from page 2-6 of TM-580;
" In collaboration with the Australian Fisheries Management Authority and industry experts, ARC tested a notch modification to their dehookers. They determined that notching the pigtail curl allows the fisher to use a rocking and pushing (instead of just pushing) motion that increases the effectiveness of circle hook removal. The notch is created where the hook lies in the bottom portion of the curl (Figure 2-7a), securing the shank enough to rock the hook from side to side while pushing the circle hook out. The notch modification can be easily and quickly accomplished with a simple metal file (Figure 2-7b) in approximately 15 minutes. During laboratory trials, the notch modification (Figure 2-7c) was found to be an effective modification to these tools to assist in hook removal, particularly circle hook removal, while maintaining the integrity of the device's tensile strength. However, it was determined that by maintaining proper line tension and using a rocking or twisting motion while pushing downward, circle hooks still could be removed effectively without the notch modification. Detailed instructions for notching the ARC dehookers can be found in Appendix A, Chapter A2."

ACE supports Sub-Alternative 5a recommended by the NMFS Southeast Regional Office of Protected Species Division to remain in compliance with the Biological Opinion. This choice would require all federally permitted non-longline Snapper Grouper vessels with hook and line gear on board:
· a short-handled dehooker for ingested hooks, and/or a short-handled dehooker for external hooks
· cushion/support device (i.e., standard automobile tire or boat cushion)
· long-nose or needle-nose pliers

· bolt-cutters
· mono-filament line cutters
· a dipnet
· at least two types of mouth openers / mouth gags

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